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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all similarly  
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
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Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE  
 MOTION TO SEAL PORTIONS OF  
 PLAINTIFFS' RESPONSE TO  
 GOOGLE'S OBJECTIONS TO SPECIAL  
 MASTER ORDER**

The Honorable Susan van Keulen  
 Courtroom 6 – 4th Floor  
 Date: May 3, 2022  
 Time: 10:00 AM

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC (“Google”)’s material should be sealed. This material is included within Plaintiffs’ Response to Google’s Objections to the Special Master’s Preservation Order. The material has been designated by Google as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only.” This motion to seal pertains to the following information.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Plaintiffs’ Response to Google’s Objections to Special Master Brush Report	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Thompson Declaration	Google	Portions highlighted in yellow throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: April 25, 2022

Respectfully submitted,

By: /s/ Amanda Bonn

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